

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
MATTIE M. LEWIS,	:	
	:	
Debtor.	:	Bankruptcy No.: 17-13268-jkf
	:	

**DEBTOR'S OPPOSITION TO CERTIFICATION OF DEFAULT OF STIPULATION OF
SETTLEMENT OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

Mattie M. Lewis, debtor herein, by and through her attorney, Rex J. Roldan, Esquire, hereby opposes the Certification of Default of Stipulation of Settlement of Motion for Relief from Automatic Stay filed by creditor, VW Credit Corporation. In support hereof, debtor respectfully represents as follows:

1. Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code on May 5, 2017.
2. On or about January 17, 2018, creditor, VW Credit Corporation, filed a Motion for Relief from the Automatic Stay.
3. The motion was resolved by the parties when a Stipulation was entered into and filed on or about April 19, 2018. Said stipulation required that payments in the amount of \$1,809.65 and \$603.22, totaling \$2,412.87, be paid through April, 2019
4. While the parties were negotiating the Stipulation, debtor continued to make payments to VW Credit Corporation. Attached as **Exhibit A** are copies of the relevant pages of debtor's bank statements showing payments to VW Credit Corporation as follows:

March 14, 2018	\$800.00
March 21, 2018	\$550.00

April 16, 2018 \$800.00

May 24, 2018 \$550.00

TOTAL \$2,700.00

5. As of the date of this Certification, debtor is ahead on the payments required by the Stipulation.

WHEREFORE, the Debtor respectfully requests that the Court deny the Default of Stipulation of Settlement of Motion for Relief from Automatic Stay filed by creditor, VW Credit Corporation.

Date: May 25, 2018

/s/ Rex J. Roldan
Rex J. Roldan, Esquire (I.D. #71690)
Washington Professional Campus
900 Route 168, Suite I-4
Turnersville, New Jersey 08012
(856) 232-1425
Attorney for Debtor

Date	Description	Deposits/Credits	Withdrawals/Debits
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03/14/18	VW CREDIT, TEL. TEL DEBIT 180313 PTEL 872164480 MATTIE M TOPSEY		\$800.00
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Totals			
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Date	Description	Deposits/Credits	Withdrawals/Debits
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03/21/18	VW CREDIT, TEL. TEL DEBIT 180320 PTEL 872164480 MATTIE M TOPSEY		\$550.00
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Totals			
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Date	Description	Deposits/Credits	Withdrawals/Debits
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
04/16/18	VW CREDIT, TEL. TEL DEBIT 180413 PTEL 872164480 MATTIE M TOPSEY		\$800.00
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
Totals		[REDACTED]	[REDACTED]

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CUSTOM
MANAGEMENT(RM)

...8466

Available balance

Activity Summary

Current posted balance

Pending withdrawals/debits

Pending deposits/credits

Available balance

Monthly Service Fee Summary

Activity

First

Previous

Next

Date	Description	Deposits/Credits	Withdrawals/Debits
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Authorized Transactions

Note: Debit card transaction amounts may change.

Posted Transactions

05/24/18	VW CREDIT, TEL. TEL DEBIT 180523 PTEL 872164480 MATTIE M TOPSEY		\$550.00
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Totals